

L7617

February 9, 2009

Dear Interested Party:

Point Reyes National Seashore has released the document Abbotts Lagoon Area, Dune Restoration Plan and Environment Assessment (EA) to improve and restore coastal dune habitat in the National Seashore for public review. An informational meeting will be held on Wednesday, March 11, 2009, at the Seashore's Red Barn at 6:00 p.m. for those wishing more information on the Dune Restoration Plan.

Point Reyes National Seashore is proposing to restore 300 acres of coastal dune habitat south of Abbotts Lagoon primarily to benefit species listed as threatened or endangered under the Endangered Species Act (e.g., federally listed species). Habitat would be restored by removing highly invasive, non-native plant species that have greatly altered sand movement, dune structure, and habitat function for native plants and animals uniquely adapted to this coastal environment. An EA has been prepared in compliance with the National Environmental Policy Act (NEPA) to assess impacts of alternative means of accomplishing this restoration.

The purpose of the action is to improve and restore coastal dune habitat in the Point Reyes National Seashore. Restoration is needed because the coastal dunes at the Abbotts Lagoon project site provide critical habitat for four federally listed species and several rare or unique species of plants and animals. This is the park's best remaining intact dune habitat and includes some of the largest expanses of rare native plant communities remaining in the Seashore. These sensitive habitats and the species that inhabit them are imminently threatened by the presence and continued spread of two aggressive non-native species: European beachgrass (or "*Ammophila*") and ice plant (*Carpobrotus* spp.).

Options for treating different subsets of the 300-acre project area now slated for *Ammophila* removal were initially developed after public scoping and refined using value analysis. Value analysis is an organized team effort directed at analyzing the functions of facilities, processes, systems, equipment, services, and supplies for the purpose of achieving essential functions at the lowest long-term cost consistent with required performance, reliability, quality, safety, and achievement of National Park Service mission priorities such as resource protection, sustainability, and quality visitor experience. The value analysis and other internal scoping eventually helped the park decide that the entire 300-acre project area should be treated.

Alternatives presented in the project EA evaluate different approaches to achieving restoration within the 300-acre project area. Alternative C would achieve restoration objectives using mechanical excavation treatments with potential re-treatment of resprouts with minimal use of herbicides through spot spraying of herbicides, and Alternative B would use a combination of treatment methods including fire and herbicides in addition to mechanical excavation. Alternative A is the No Action Alternative and would continue the present program of small-scale eradication projects.

The preferred alternative is Alternative C. Emphasis on Mechanical Control Methods. The preferred alternative was selected after initial assessment and comparison of the potential impacts associated with four alternatives. Both Alternatives B and C would equally improve the condition of resources in the

long term, but Alternative C would have fewer adverse impacts and therefore result in less loss of resource during implementation. Cost was considered as well, but was secondary to the alternative's ability to meet the primary objective of resource protection.

Previous work on experimental plots in the Seashore and elsewhere have indicated that the most effective treatment to restore dunes where these invasive species exist is to remove all biomass and bury it deep under a cap of clean sand. This requires the use of heavy motorized equipment. Small scale hand removal to protect resources (where *Ammophila* is interspersed with wetland or rare vegetation for example) and the minimal use of herbicides to minimize resprouts may also occur if needed. Small experimental burns are also possible. Any restoration work would be accomplished within the constraints imposed by laws, policies and sound management practices including environmental protection measures. For example, no heavy equipment would be used within 500 feet of where snowy plovers are nesting, and surveys and flagging would prevent impacts from excavators to sensitive plant and animal species. In addition, a minimal amount of herbicides would be used only in selected areas when wind speeds are less than 10-12 mph with protective buffers established adjacent to wetlands, rare plants, nesting areas, and adjacent land uses and would involve only a very controlled application of herbicide directly to resprouts.

Consultation on potential impacts to listed species will be conducted with the US Fish and Wildlife Service. In addition, because the project area is located within the coastal zone and will result in modification to wetland resources, the project will also require review by and permits from the San Francisco Bay Regional Water Quality Control Board, US Army Corps of Engineers, and federal consistency review by the California Coastal Commission.

Part of project planning is the examination of environmental impacts through the National Environmental Policy Act (NEPA) process. Because no significant impacts are expected to occur, the Seashore has prepared an environmental assessment, rather than an environmental impact statement. In the National Park Service, the public is asked to comment on the EA or any other aspect of the proposal in an early 45-day comment period. Your comments can be submitted through the NPS Planning, Environment and Public Comment (PEPC) website at <http://parkplanning.nps.gov/>, or you may send comments to the Seashore at pore_planning@nps.gov or via fax or letter. Letters should be addressed to: Superintendent: Coastal Dune Restoration Project, Point Reyes National Seashore, 1 Bear Valley Road, Point Reyes Station, CA 94956; or FAXd to (415) 663-8132. Your comments will be most helpful to us if received no later than **March 20, 2009**.

Please note that names and addresses of people who comment become part of the public record. If you wish to withhold your name and or address from the public record for this project, you must state your request *prominently* at the beginning of your comments. Anonymous comments may not be considered. We will make all submissions from organizations, businesses, and from individuals who identify themselves as representatives or officials of organizations or businesses available for public inspection in their entirety. Individuals not representing business or organizations may request that the NPS withhold their name and/or address from the record.

Sincerely,

Don L. Neubacher
Superintendent